

GERSTMAN SCHWARTZ^{LLP}
ATTORNEYS AT LAW

April 16, 2021

VIA E-FILE

Hon. Steven I. Locke
United States District Court Judge
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: United States v. Singh
Magistrate Docket No. 20-326

Dear Judge Locke:

The above-referenced Defendant, Amardeep Singh (hereinafter “Mr. Singh”), respectfully requests that this Court modify his deferred prosecution agreement (the “Agreement”) to amend the current period of Pretrial Services supervision from 24 months, to 6 months, and/or for further relief as this Court deems just and proper.

On April 24, 2020, a criminal complaint was filed in the Eastern District of New York alleging the commission of an offense against the United States, to wit: unlawful accumulation of designed material, in violation of Title 50, United States Code, Sections 4512 and 4513. After a thorough investigation, on September 8, 2020 the United States Attorney’s Office filed the aforementioned agreement as it was determined that the interest of the United States and Mr. Singh’s interest would best be served by deferring prosecution in this District for a period of 24 months.

During the past 7 months, Mr. Singh has complied with all terms and conditions of the agreement, to wit:

- a. Mr. Singh accepted and acknowledged responsibility for his behavior.
- b. Mr. Singh agreed to be supervised by the United States Pretrial Service Agency for a period of 24 months, and has in fact been under their supervision for almost 7 months, without any issue or reprimand.
- c. Mr. Singh has not violated any federal, state, and/or local law.
- d. Mr. Singh has only associated with law abiding persons.

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- e. Mr. Singh has permitted visits to his home and place of employment by the supervising U.S. Pretrial Services Officer.
- f. Mr. Singh has followed the advice and instructions of the supervising U.S. Pretrial Services Officer.
- g. Mr. Singh has reported to the U.S. Pretrial Services Officer as directed.
- h. Mr. Singh has not used illegal drugs.
- i. Mr. Singh has complied with the executed Stipulation, attached to the Agreement as "B" regarding the disposition of personal protective equipment.¹

Given the aforementioned, we respectfully request that this Court discharge Mr. Singh from the supervision of the U.S. Pretrial Services Office, together with any further and different relief as this Court deems just and proper.

Respectfully Submitted,



David M. Schwartz, Esq.

cc: Anthony Bagnuola
U.S. Attorney's Office
Eastern District of New York
610 Federal Plaza
Central Islip, New York 11722

¹ Mr. Singh has donated a total of \$455,315.90 worth of personal protective equipment to hospitals, health care providers, first responders, essential workers and/or other relevant persons, entities or organizations.